

United States District Court
Southern District of Texas
FILED

JUN 20 2020

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

David J. Bradley, Clerk

United States of America
v.Sergio Omar LANDA Jr.
YOB: 1989, US Citizen

Defendant(s)

Case No. M-20-1255-M

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 20, 2020 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

31 U.S. Code § 5332

Defendant did knowingly and intentionally attempt to evade currency reporting requirements, by knowingly concealing approximately \$100,025 in United States currency in a vehicle before it exited the United States into Mexico at the Rio Grande City, Texas, Port of Entry.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complaint authorized by AUSA Michael Mitchell

Sworn to and executed by reliable
electronic means, per FRCrP 4.1, &
probable cause found on:

Date:

6/20/2020 @ 11:28AM

City and state:

McAllen, TX

Complainant's signature

Rolando Lerma Jr., HSI Special Agent

Printed name and title

Judge's signature

J. Scott Hacker, U.S. Magistrate

Printed name and title

Attachment "A"

I, Rolando Lerma Jr., Special Agent with United States Immigration and Customs Enforcement, Homeland Security Investigations (HSI), being duly sworn, depose and say the following:

On June 20, 2020, at approximately 7:30 p.m., U.S. Customs and Border Protection Officers encountered Sergio Omar LANDA Jr. attempting to drive a vehicle into Mexico at the Rio Grande City Port of Entry in Rio Grande City, Texas.

LANDA declared to officers that he did not have more than \$10,000 U.S. dollars with him or inside the vehicle during an inspection.

Officers examined the vehicle and discovered a black bag containing bundles of U.S. currency concealed behind the rear seat of the vehicle. Officers subsequently counted a total of \$100,000 U.S. dollars inside the black bag and another \$25 U.S. dollars in LANDA's personal effects, for a grand total of \$100,025. Officers detained LANDA and contacted HSI.

HSI Special Agent Rolando Lerma Jr. read LANDA his Miranda Rights and LANDA waived his right to an attorney. LANDA claimed he was en route to the city of Camargo, Tamaulipas, Mexico, to meet with a female. LANDA said he was going to use the money to purchase a ranch property in Camargo from the female that evening.

LANDA said he concealed the money inside the vehicle to avoid reporting it to officers. LANDA said he knew that failing to declare U.S. currency over \$10,000 U.S. dollars when exiting the United States to Mexico was a violation of U.S. law.